

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Criminal No. 19-cr-20310

Plaintiff,

v.

Hon. Sean F. Cox

D-1 Kevin Keshawn Young,  
D-2 Aaron Marquis Shooks,  
D-3 Joseph Alexander Ellington,

Defendants.

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**FORFEITURE BILL OF PARTICULARS**

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The United States of America, by and through its undersigned counsel, submits this Forfeiture Bill of Particulars pursuant to Federal Rule of Criminal Procedure 7(f), to provide notice of specific property that the government intends to forfeit upon conviction.

The allegations set forth in the Indictment, ECF No. 27, are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a). Property subject to forfeiture to the United States pursuant to 18 U.S.C. § 924(d), together with 28 U.S.C. § 2461(c), includes, but is not limited to, the following:

1. Walther PK380 Pistol CAL:380 SN:WB074175;
2. Eight (8) Rounds Assorted Ammunition CAL:380;
3. Walther PK380 Pistol CAL:380 SN:WB121065;
4. Two (2) Rounds Hornady Ammunition CAL:380;
5. Eighty-four (84) Rounds Assorted Ammunition CAL:Multiple;
6. One (1) Rounds Hornady Ammunition CAL:380;
7. One (1) Rounds Remington Ammunition CAL:22; and,
8. One (1) Rounds Remington Ammunition CAL:32.

This notice does not limit the government from seeking a forfeiture money judgment or the forfeiture of additional specified property.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

s/ Michael El-Zein  
Michael El-Zein  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9770  
[michael.el-zein@usdoj.gov](mailto:michael.el-zein@usdoj.gov)  
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Dated: August 26, 2019

**CERTIFICATION OF SERVICE**

I hereby certify that on August 26, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/ Michael El-Zein

Michael El-Zein  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9770  
[michael.el-zein@usdoj.gov](mailto:michael.el-zein@usdoj.gov)  
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